

## **EXHIBIT 2**

**UNREDACTED VERSION  
OF DOCUMENT  
SOUGHT TO BE SEALED**

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17 UNITED STATES DISTRICT COURT  
18 NORTHERN DISTRICT OF CALIFORNIA  
19 SAN FRANCISCO DIVISION

20 WAYMO LLC

21 Case No. 17-cv-00939-WHA

22 Plaintiff,

23 **PLAINTIFF’S LIST OF ASSERTED  
24 TRADE SECRETS PURSUANT TO CAL.  
25 CODE CIV. PROC. SECTION 2019.210**

26 v.

27 UBER TECHNOLOGIES, INC.;  
28 OTTOMOTTO, LLC; OTTO TRUCKING  
LLC,

29 **DOCUMENT FILED UNDER SEAL**

30 Defendants.

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1

- [REDACTED]  
2 presentation that was among files downloaded by Anthony Levandowski in January  
3 2016. This presentation includes [REDACTED]  
4 reproduced below:  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]  
12 [REDACTED]  
13 [REDACTED]

14 (Ex. 13 at 29.) [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]

20

- See *supra*, ¶ 9, second bullet for reasonable steps taken to maintain secrecy.
- The trade secret claimed is [REDACTED]  
21 [REDACTED] (Ex.  
22 13 at 29).

23

85. [REDACTED] (Ex. 14).

- This Excel spreadsheet was included among files downloaded by Anthony Levandowski  
25 in January 2016. This confidential document contains detailed technical information  
26 about [REDACTED] This  
27 information derives value from not being generally known to the public or to competitors  
28

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1 because it is important information for a competitor seeking to replicate what Waymo  
2 was doing and where it hoped to get. Such information includes [REDACTED]

3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]

12 • *See supra*, ¶ 9, second bullet for reasonable steps taken to maintain secrecy.  
13 • The trade secret claimed is the information contained in the [REDACTED]

14 [REDACTED]  
15 86. [REDACTED] (Ex. 15).

16 • This document was included among files downloaded by Anthony Levandowski in  
17 January 2016. This confidential document contains [REDACTED]

18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]

24 • *See supra*, ¶ 9, second bullet for reasonable steps taken to maintain secrecy.  
25 • The trade secret claimed is [REDACTED]

26 [REDACTED]  
27 87. [REDACTED] (Ex. 16).

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1     • The trade secret claimed is [REDACTED]  
2 [REDACTED]  
3 107. [REDACTED]  
4 [REDACTED]  
5     • These schematics were included among files downloaded by Anthony Levandowski on  
6 December 11, 2015 from Waymo’s SVN schematic repository folders  
7 [REDACTED] These schematics derive economic value from not being generally  
8 known to the public or to competitors because they contain extensive details regarding  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]  
12 [REDACTED]  
13 [REDACTED]  
14     • *See supra*, ¶ 94, second bullet for reasonable steps taken to maintain secrecy.  
15     • The trade secret claimed is [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18     • These schematics were included among files downloaded by Anthony Levandowski on  
19 December 11, 2015 from Waymo’s SVN schematic repository folders [REDACTED]  
20 These schematics derive economic value from not being generally known to the public or  
21 to competitors because they contain [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]  
26 [REDACTED]  
27     • *See supra*, ¶ 94, second bullet for reasonable steps taken to maintain secrecy.  
28     • The trade secret claimed is [REDACTED]

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1 [REDACTED]

2 109. [REDACTED]

3 [REDACTED]

4 • Anthony Levandowski downloaded over 14,000 PCB design files on December 11, 2015  
5 from Waymo’s SVN schematic repository, covering each and every project developed at  
6 Waymo. These confidential design schematics [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]  
12 [REDACTED]

13 • *See supra*, ¶ 94, second bullet for reasonable steps taken to maintain secrecy.  
14 • The trade secret claimed is [REDACTED]  
15 [REDACTED]

16 **J. Waymo’s LiDAR System Design Know-How, Including Accumulated  
17 Knowledge About Failed Designs**

18 110. [REDACTED]

19 • One LiDAR design Waymo explored [REDACTED]  
20 [REDACTED] derives economic value  
21 from not being generally known to the public or to competitors because it reflects  
22 significant time and effort spent by Waymo pursuing the [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]  
26 [REDACTED]  
27 [REDACTED]